

JEFF WINCHESTER (Nevada Bar No. 10279)
E: JWinchester@ohaganmeyer.com
O'HAGAN MEYER PLLC
300 S. 4th Street, Ste 1250
Las Vegas, NV 89101
T: 725.286.2801

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEREMY BLAIR, an individual;

Plaintiff,

vs.

COMPLETE ASSOCIATION
MANAGEMENT COMPANY, LLC a Nevada
limited liability company, MANAGED
BUSINESS SERVICES, INC., a Nevada
Corporation,

Defendants.

Case No.: 2:25-cv-00432-RFB-EJY

**DEFENDANT MANAGED BUSINESS
SERVICES, INC.'S STIPULATION AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF COMPLAINT**

[FIRST REQUEST]

Pursuant to LR IA 6-1(a), LR IA 6-2, and LR 7-1, the undersigned counsel of record for Defendant Managed Business Services, Inc., files this Stipulation and Order to extend Managed Business Services Inc.'s deadline to answer or otherwise respond to Plaintiff's Complaint (ECF No. 1) through and including Monday, June 16, 2025.

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1 This extension request is made in good faith and not for purposes of delay. Counsel for
 2 Managed Business Services, Inc. was recently assigned to the case and until recently was preparing
 3 for three arbitration trials. Counsel for Managed Business Services, Inc. has been in contact with
 4 counsel for Plaintiff who have consented to the requested extension. Plaintiff will not be prejudiced
 5 by this extension, as the purpose of this first request for the extension is to allow Managed Business
 6 Services, Inc., the opportunity to fully analyze the claims against it and to give the parties the
 7 opportunity to continue good faith efforts to potentially settle this case.
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 10 Dated this 6th day of June, 2025

11 O'HAGAN MEYER

12
 13 By /s/ Jeff Winchester
 14 JEFF WINCHESTER
 15 Nevada Bar No. 10279
 16 300 S. 4th Street, Suite 1250
 17 Las Vegas, NV 89101
Attorneys for Defendants

18 Dated this 6th day of June 2025

19 GREENBERG GROSS LLP

20 By: /s/ Matthew T. Hale

21 Michael A. Burnette
 22 Nevada Bar No. 16880
 23 1980 Festival Plaza Drive
 24 Suite 730
 Las Vegas, Nevada 89135
Attorneys For Plaintiff's

25 **IT IS SO ORDERED.**

26 
 27 **U.S. MAGISTRATE JUDGE**

28 **Date: June 6, 2025**